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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
The Southern New England)
Telephone Company)
)
Implementation of the) CC Docket No. 96-128
Pay Telephone Reclassification)
and Compensation Provisions)
of the Telecommunications)
Act of 1996)

PETITION FOR EXPEDITED WAIVER

The Southern New England New England Telephone (SNET) respectfully requests an expedited waiver, pursuant to the Commission's rules,¹ of the requirement to provide payphone lines that will be capable of passing payphone-specific coding digits by September 30, 1998. SNET seeks this expedited waiver due to a work stoppage, which began on August 23, 1998, involving SNET's bargaining unit personnel. The work stoppage has affected SNET's management personnel as well, as the managers have been filling the positions normally held by bargaining unit employees in order to meet the critical needs of the business.

During this work stoppage, SNET's management personnel have been attempting to balance the urgent needs of its customers by continuing to provide necessary services during this critical period. Managers have been deployed to field positions to attend to core needs of running the business during this work stoppage.

¹ 47 C.F.R. § 1.3.

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Prior to the start of the work stoppage, SNET had been progressing steadily with the implementation work for Flex ANI installation and was on schedule to meet the September 30, 1998 compliance date, but the current work stoppage has brought this work to a complete standstill. SNET, therefore, respectfully requests a waiver of its obligation to provide payphone-specific coding digits by September 30, 1998, until 12 weeks after settlement of the work stoppage. This added time will allow SNET a recovery period to clear up the backlog of work resulting from the work stoppage and resume the translation and testing work necessary for Flex ANI installation.

I. BACKGROUND

On March 9, 1998, the Commission issued an Order² designating automatic number information indicators (ANI ii) and flexible automatic numbering identification (Flex ANI) as the methods to provide payphone-specific coding digits that comply with the requirements of the Payphone Orders. The Commission's Order also granted a number of waivers to allow local exchange carriers (LECs), including SNET, until September 30, 1998, to provide Flex ANI for 75% of the smart payphones in its service area.

After the Commission granted its waiver, SNET continued working with its switch vendors toward resolution of problems

² Memorandum Opinion and Order, Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, DA 98-481, released March 9, 1998.

identified by SNET network personnel during the installation and testing of the Flex ANI features. For SNET, the most significant problem identified concerned 800-type database services calls at tandem switches. In separate proceedings, SNET and Southwestern Bell Telephone Company, Pacific Bell and Nevada Bell (collectively) have brought the problem concerning 800-type database services calls at tandem switches before the Commission.³

In order to meet the September 30, 1998 due date, however, SNET has made special arrangements with its switch vendors to temporarily deploy end office Service Switching Point (SSP) functionality in all 1AESS, 5ESS and EWSD host and stand-alone switches until the new tandem Flex ANI feature is available. Deployment of end office SSP functionality requires significant end office translations and testing. This work effort had been scheduled to begin just as the work stoppage began. SNET also was prepared to tariff the service by September 15, 1998.

It is difficult for SNET to determine the extent and duration of this union dispute, but SNET foresees an increasing backlog of its normal workload as a result of this work stoppage. SNET will require a recovery period after settlement to clear up the increasing backlog of work resulting from the work stoppage. Also included during this timeframe of recovery will be our provision of training to our network personnel on taking Flex ANI

³ SNET Ex Parte Letter to Rose Crellin, Enforcement Division, dated March 2, 1998, CC Docket No. 96-128, p. 3; Southwestern Bell Telephone Company, Pacific Bell and Nevada Bell Petition to Extend Limited Waiver to Implement Flex ANI, dated May 22, 1998, CC Docket No. 96-128, p. 12.

orders and provisioning the service. SNET, therefore, respectfully requests a waiver of its obligation to provide payphone-specific coding digits by September 30, 1998, until 12 weeks after settlement of the work stoppage.

SNET sent a carrier memorandum, dated March 9, 1998, to all its carrier customers which provided information on the availability and ordering procedure for Flex ANI. A copy of SNET's carrier memorandum is attached. SNET has also filed its Short Term Network Change Notification (Notification) No. CNM 100 with the Commission's Network Services Division regarding the Temporary Deployment of End Office SSP Functionality that will be deployed to allow screening of Flex ANI information digits to only those interexchange carriers electing to receive Flex ANI digits. A copy of that Notification is also attached. This Notification has also been posted on SNET's publicly accessible web page (<http://clec.snet.com/library>).

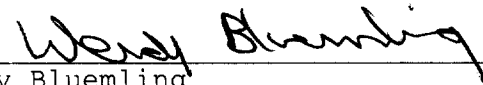
SNET does not anticipate that this delay will significantly disrupt interexchange carrier plans to utilize Flex ANI service. It is SNET's understanding that customer demand nationwide has been slow to develop in areas where Flex ANI is already tariffed. And to date, no carrier has presented immediate demands to SNET for the service.

II. CONCLUSION

SNET has been steadily progressing toward completion of its Flex ANI implementation to meet the compliance date of September 30, 1998. As a result of the current work stoppage, all work related to Flex ANI implementation has been placed on hold temporarily in order to deal with the urgent needs of running the business and meeting customer demands during this critical period. Once settlement with the union is reached, SNET will begin the recovery process of clearing up the backlog of work resulting from the work stoppage and resume the translation and testing work necessary for Flex ANI installation. The additional time, of 12 weeks after settlement of the work stoppage, will allow for installation of the systems needed to process and provision the service, as well as, the necessary training of network service personnel on the use of these systems.

Respectfully submitted,

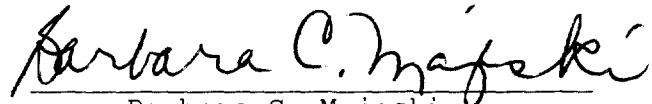
THE SOUTHERN NEW ENGLAND
TELEPHONE COMPANY


Wendy Bluemling
Director-Regulatory Affairs
and Public Policy
227 Church Street
New Haven, CT 06510-1806
(203) 771-8514

September 8, 1998

CERTIFICATE OF SERVICE

I, Barbara C. Majeski, hereby certify that SNET's Petition for Expedited Waiver has been filed this 8th day of September, 1998, to all parties listed below.


Barbara C. Majeski

Magalie Roman Salas
Secretary
1919 M Street N.W.
(Original plus six copies)

Tariff Division
Room 518
1919 M Street N.W.
(One Copy)

Kathryn C. Brown
Common Carrier Bureau
Room 500
1919 M Street N.W.
(One Copy)

ITS
Suite 140
2100 M Street N.W.
(One Copy)

Gregory Lipscomb
Common Carrier Bureau
Room 500
1919 M Street N.W.
(One Copy)

All Copies - Hand Delivered

Southern New England Telephone
530 Preston Avenue
Meriden, Connecticut 06450

Anne Galliber
Manager - Calling/Trunking
Network Product Development

Date: March 9, 1998
Subject: Flexible ANI Ordering and Availability
To: Interexchange Customers

On October 7, 1997, the FCC released an Order (DA 97-2162) requiring the Local Exchange Carriers (LECs) and Payphone Service Providers (PSPs) to provide unique ANI II digits from payphones for payphone compensation identification purposes. By March 9, 1998, unique ANI II digits must be transmitted on all 800 and Access dialed calls. SNET is planning to transmit the ANI II digits of "27", "29" and "70" to Interexchange Carriers that want Flexible ANI and the ANI II digits of "27" and "07" for ICs that don't request Flexible ANI for originating calls from payphone lines for all 800 and Access dialed calls. There is no charge to Interexchange Carriers for Flexible ANI if you require this for payphone compensation identification purposes.

Availability

SNET will have all of our End Offices capable of Flexible ANI by March 9, 1998 with the exception of the following End Offices and unique call types for which SNET has filed an Ex Parte with the FCC on March 2, 1998:

<u>End Office</u>	<u>Date of FlexANI Availability</u>
HMDNCT00DS0	June 23, 1998
GUFDCT00DS0	June 30, 1998
NWTWCT00DS0	July 13, 1998

Flexible ANI will be opened at an End Office level basis therefore, all your trunk groups from an End Office will either provide Flexible ANI or normal ANI.

Ordering Flexible ANI

Initial Request - to Provide Flexible ANI on existing trunk groups

In order to request Flexible ANI for payphone compensation identification purposes within SNET's territory, it is essential that you contact Joann Kligerman, Project Manager for SNET at (203) 694-7223 with the following information:

- 1) the name and phone number for the following people in your organization:
Project Manager
Network Translation Technician

- 2) all CIC codes that you are requesting to be opened for Flexible ANI

Subsequent Orders - to Obtain Flexible ANI on new trunk groups

After you have completed the Initial Request process, all requests for Flexible ANI should be submitted on the Translation Questionnaire. The Translation Questionnaire, as identified in the Access Ordering Guide Field "ANI" (identified as number 14), will be utilized for your request of Flexible ANI on the installation of all new trunk groups.

Other Problems Encountered after Installation

If after installation of Flexible ANI, a problem is encountered where SNET is not sending the ANI II digits of "07" or "27" for payphones to Interexchange Carriers that have not requested Flexible ANI then the following will occur:

- 1) SNET will convert the Flexible ANI Interexchange Carriers to normal ANI in the problem End Offices
- 2) SNET will contact the Interexchange Carriers Project Manager (identified from above) to inform you that SNET was required to remove Flexible ANI for the specific End Office

Additional Information

If you need additional information, please contact your SNET Network Marketing and Sales Account Manager. If you do not have an Account Manager, further information may be obtained by calling (203) 634-6363.

If you need to make a change in your mailing label, please call Rita Manfredi on (203)694-7102.

Sincerely,

Anne Galliher



Southern New England Telephone
227 Church Street
New Haven, Connecticut 06510
Phone (203) 771-8786
Fax (203) 624-3549
E-mail address:
barbara.majeski@snet.com

Barbara C. Majeski
Regulatory Affairs
and Public Policy

August 22, 1998

Network Change Notification No. CNM100

Ms. Geraldine Matise, Chief
Network Services Division
Common Carrier Bureau
Federal Communications Commission
2000 M Street, N.W. - Room 230
Washington, D.C. 20036

Re: Short Term Public Notice of Network Change Under Rule 51-.333(a)

The accompanying Network Change Notice issued by The Southern New England Telephone Company (SNET) is sent to you for filing in compliance with the requirements of §§ 51.325-51.335 of the Commission's rules.

In accordance with § 51.333(a), SNET files the accompanying Certificate of Service indicating that a copy of this short term public notice has been served on the identified interconnecting carriers five (5) days prior to filing with the Commission.

SNET's Public Notice of Network Change has also been provided through its publicly accessible Internet site, per § 51.329(a) of the Commission's rules. Specific network change information can be obtained on the Internet at the following location:

<http://clec.snet.com/library>

SNET's Short Term Public Notice of Network Change refers to the change identified below.

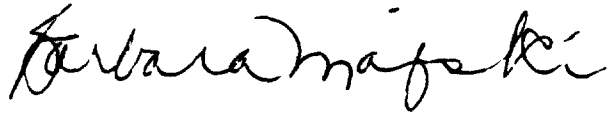
**SNET Network Change Notification No. CNM100
Temporary Deployment of End Office
Service Switching Point (SSP) Functionality**

Ms. Geraldine Matise, Chief

August 22, 1998

Page 2

All correspondence and inquiries in connection with this filing should be directed to me at the above address or telephone number.

A handwritten signature in cursive script, reading "Barbara Majeski".

Barbara Majeski

Manager-Regulatory Affairs and Public Policy

Attachments: Short Term Public Notice of Network Change
Certificate of Service

**SHORT TERM PUBLIC NOTICE OF
NETWORK CHANGE UNDER RULE 51.333(a)**

**THE SOUTHERN NEW ENGLAND TELEPHONE COMPANY (SNET)
227 Church Street, New Haven, CT 06506**

Network Disclosure No. CNM100

Date of Change: September 30, 1998

**Location of Change: All 1A ESS, 5ESS and EWSD Host and
 Standalone Switches**

**Type of Change: Temporary Deployment of End Office
 Service Switching Point (SSP) Functionality**

End Office SSP functionality will be deployed to allow screening of FlexANI information digits to only those ICs electing to receive FlexANI digits. This is a requirement to meet the FCC mandate to provide per-call compensation capabilities for Toll Free Number calls originated from Payphone Service Provider station lines. Access Tandem screening of Toll Free Numbers will be reinstated when features under development by vendors become available.

Impact Of Change:

Local office translations will be changed for routing of calls to Toll Free Numbers. This is low risk as similar translations exist at the Access Tandem offices,

Contact Personnel:

Barbara Majeski
Manager-Regulatory Affairs and Public Policy
310 Orange Street / Room 6K2
New Haven, CT 06506
(203) 771-8786

CERTIFICATE OF SERVICE

I, Barbara Majeski, hereby certify that five (5) business days in advance of its filing with the Commission, SNET served a copy of the Short Term Public Notice Under Rule 51.333(a) regarding Network Change Notification No. CNM100 on the following interconnecting carriers:


Barbara C. Majeski

ACC Long Distance of CT. Corp.
400 West Avenue
Rochester, NY 14611

Access Network Systems, Inc.
300 West Service Road
Chantilly, VA 22021

AT&T
c/o Attorney K. White
32 Avenue of Americas, Room 2700
New York, NY 10013

Atlas Communications, Ltd.
482 Norristown Road
Blue Bell, PA 19422

Brooks Fiber Communications of CT.
425 Woods Mill Road, So.
Town & Country, MO 63017

Cable & Wireless, Inc.
1919 Gallows Road
Vienna, VA 22182

Cablevision Lightpath of Connecticut
111 New South Road
Hicksville, NY 11801

Capital Telecommunications, Inc.
200 West Market Street
York, PA 17401-1008

Comcast Telephony
Communications of CT, Inc.
1500 Market Street
Philadelphia, PA 19102-2148

Commonwealth Long Distance
105 Carnegie Center
Princeton, NJ 08540

Connecticut Telephone &
Communication Systems, Inc.
1271 South Broad Street
Wallingford, CT 06492

Cox Connecticut Telecom, LLC
801 Parker Street
Manchester, CT 06040

CRG International
d/b/a Network One
2000 Riveredge Parkway, Suite 900
Atlanta, GA 30328

Easton Telecom Services, Inc.
4646 E. Strretsboro Road
P. O. Box 550
Richfield, OH 44286

Excel Telecommunications, Inc.
8750 North Central Expressway
Dallas, TX 75231

Group Long Distance, Inc.
1451 West Cypress Creek Rd., Suite 200
Fort Lauderdale, FL 33309

Intermedia Communications, Inc.
3625 Queen Palm Drive
Tampa, FL 33619

LDM Systems, Inc.
254 South Main Street
New City, NY 10956

MFS Intellenet
6 Century Drive, Suite 300
Parsippany, NJ 07054

Onsite Access Local LLC
680 Fifth Avenue, 12th Floor
New York, NY 10019

SNET America, Inc.
127 Washington Avenue
North Haven, CT 06473

GE Capital Communications
6540 Powers Ferry Road
Atlanta, GA 30339

GTE Communications Corporation
1200 Walnut Hill Lane, Suite 2000
Irving, TX 75038

LCI International Telecom Corp.
8180 Greensboro Drive, Suite 800
McLean, VA 22102

MCI Metro
2250 Lakeside Boulevard
Richardson, TX 75082

Mode 1
107 Selden Street
Berlin, CT 06037

Partner Communications Group, LLC
c/o Technologies Mgmt. Inc.
210 North Park Ave.
P.O. Drawer 200
Winterpark, FL 32790

Sprint
8140 Ward Parkway
Kansas City, MO 64114